

288 NORTH PLANK ROAD, NEWBURGH, NY 12550

PHONE: (845) 566-4400 · FAX: (845) 569-0111 · TOLL FREE: (800) 610-4401 · (888) 2SSD-SSI
WEB SITE: WWW.DENNISKENNYLAW.COM · E-MAIL: DENNISKENNYLAW@CS.COM

DENNIS KENNY, Esq. ^(NY & PA)
KATHERINE M. USEWICZ, Esq.
JEFFREY C. LEO, Esq.
SCOTT T. BLACK, Esq. ^(NY & CA)
EDWARD C. DELAUTER, Esq.
TARA L. JOHNSON, Esq. ^(FL)
JOSEPHINE GOTTESMAN Esq.

OF COUNSEL
EVAN M. FOULKE, Esq. ^(NY & NJ)
GREGORY M. SOBO, Esq.

VIA ECF

November 5, 2024

Hon. Robert W. Lehrburger
United States Magistrate Judge
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

RE: Edelglass v. Commissioner SSA
24-CV-04936 (RWL)

Dear Magistrate Judge Lehrburger:

This office represents Plaintiff in the above-referenced Social Security appeal.

Plaintiff's motion and brief are due to be filed tomorrow, 11/6/24.

I write to respectfully apprise the Court that this afternoon I was involved in a car accident with two other cars. A copy of the papers generated by this accident can be faxed or e-mailed to Chambers tomorrow upon request.

While no one involved was seriously hurt, our car suffered a great deal of front-end damage and we were held up at the accident site for several hours. Papers can be faxed to Chambers tomorrow should your Honor so request.

Plaintiff is thus respectfully requesting an extension until 11/29/24 in which to file his motion and brief. Should the Court grant this request, Plaintiff's motion and brief will be due on 11/29/24 and Defendant's cross-motion and brief will then be due on 12/30/24. Plaintiff's reply, if any, will be due on 2/13/25.

Due to the lateness of this request, we have been unable to reach Counsel for the Commissioner.

Thank you for your consideration.

ADDITIONAL OFFICES AT:

55 MAIN STREET, GOSHEN, NY | 3344 ROUTE 9 NORTH, 1ST FLOOR, POUGHKEEPSIE, NY | 18 COMPUTER DRIVE WEST, SUITE 109, ALBANY, NY

THE FIRM RESERVES THE RIGHT TO ASSIGN ALL MATTERS TO ANY MEMBER OR ASSOCIATE ATTORNEY

Respectfully submitted,

/s/ JOSEPHINE GOTTESMAN

Cc: Nahid Sorooshyari, Esq. (VIA ECF).

Extension granted as follows: Plaintiff's motion due by Nov. 29, 2024; Defendant's response-cross-motion due by Jan. 30, 2025; Plaintiff's reply due by Feb. 13, 2025.

SO ORDERED:

11/6/2024



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE